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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BARTELL RANCH LLC, *et al.*,  
Plaintiffs,

v.

ESTER M. MCCULLOUGH, *et al.*,  
Defendants.

WESTERN WATERSHEDS  
PROJECT, *et al.*,  
Plaintiffs,

v.

UNITED STATES DEPARTMENT  
OF THE INTERIOR, *et al.*,  
Defendants.

Case No. 3:21-cv-80-MMD-CLB  
Related Case No. 3:21-cv-103-MMD-  
CLB  
(Consolidated)

**FEDERAL DEFENDANTS'  
RESPONSE TO WINNEMUCCA  
INDIAN COLONY'S MOTION TO  
INTERVENE**

1 The Winnemucca Indian Colony moved on February 11, 2022, to intervene in  
2 this action. *See* ECF No. 179. Federal Defendants take no position on that motion.

3 Federal Defendants do not believe, however, that the Colony's intervention  
4 should impact resolution of the existing claims in this case. Accordingly, if the Colony  
5 is permitted to intervene, Federal Defendants intend to propose that their intervention  
6 not impact the schedule for merits briefing on the existing parties' claims and that the  
7 Colony's claims be briefed on a separate schedule.  
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10 Respectfully submitted this 24th day of February, 2022.

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15 /s/ Arwyn Carroll  
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